

**UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF VIRGINIA**

**Alexandria Division**

|                                    |   |                                 |
|------------------------------------|---|---------------------------------|
| <b>UNITED STATES OF AMERICA</b>    | : |                                 |
|                                    | : |                                 |
| <b>v.</b>                          | : | <b>Case No. 1:21-cr-260 LMB</b> |
|                                    | : |                                 |
| <b>JAIRO AGUILERA SAGASTIZADO,</b> | : |                                 |
|                                    | : |                                 |
| <b>Defendant.</b>                  | : |                                 |

**NOTICE: DEFENDANT JAIRO AGUILERA SAGASTIZADO SUPPORTS  
COURT'S SEVERANCE OF TRIAL**

Defendant Jairo Aguilera Sagastizado supports this Court's decision to sever this case into two trials. *See* ECF 713. As noted by his co-defendants, this decision will allow defendants the benefit of being able to sit at counsel table with their lawyers and consult at all points during the trial. *See* ECF 721 at 1; ECF 723 at 1. It is critical that defendants have access to both their lawyers and that, in this complex case, co-counsel can consult with each other in real time as the evidence is presented. ECF 723 at 1. Severance will also simplify the case for both the Court and the jury as well as resolve potential *Bruton* issues and concerns about antagonistic defenses among co-defendants. *See* ECF 721 at 1; ECF 723 at 2. The government's objections to severance are not persuasive for the numerous reasons detailed by his co-defendants. *See* ECF 721 at 2-4; ECF 723 at 3.

Respectfully submitted,

JAIRO AGUILERA SAGASTIZADO  
By Counsel

/s/  
Joseph King  
VA Bar No. 65632  
King, Campbell, Poretz & Mitchell, PLLC  
118 N. Alfred Street  
Alexandria, VA 22314  
Tel.: (703) 399-0010  
Fax: (703) 652-6010  
[jking@kingcampbell.com](mailto:jking@kingcampbell.com)

/s/  
Jeffrey Zimmerman  
VA Bar No. 38858  
Jeffrey Zimmerman, PLLC  
108 N. Alfred Street  
Alexandria, VA 22314  
Tel: (703) 548-8911  
Fax: (703) 548-8935  
Email Address: [www.zimpacer.com](http://www.zimpacer.com)

### CERTIFICATE OF SERVICE

I hereby certify that on this 19th day of December 2023, a true and accurate copy of the foregoing was electronically filed and served via the Court's CM/ECF system to all counsel of record.

/s/  
JEFFREY D. ZIMMERMAN